



Joshua N. Pila
General Counsel
Local Media Group
T 404-327-3286
Joshua.pila@meredith.com

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VIA ECFS

Federal Communications Commission
445 12th Street, SW
Washington DC 20554

RE: Initial Comments (MB Docket No. 17-317; MB Docket No. 17-105)

Dear Madam Secretary,

Meredith Corporation's Local Media Group ("Meredith"), which includes 17 television stations reaching 11 percent of U.S. households, applauds the Commission's recognition that some of the Commission's rules need to be modernized for the electronic world. In response to this Notice of Proposed Rulemaking¹ regarding certain paper-based notification rules in the cable context, Meredith supports the comments of the National Association of Broadcasters in these dockets.

In particular, Meredith agrees that the FCC should harmonize the cable and satellite rules to set the default election at retransmission consent. That is, if written notice is not provided, the parties would default to retransmission consent (and not must carry).


Setting the default to retransmission consent will save time, money, and effort for cable operators and broadcasters alike. For broadcasters, it will save the expense of certified mail and the effort required for a paper-intensive process. On the cable operator side, it will save time and effort in the tracking of paper correspondence received.

Furthermore, the Commission has recently focused its efforts on moving from paper to electronic filing. For example, the FCC has moved to the public inspection file on FCC.gov. Stations already post election notices to their FCC.gov public inspection file. Given its ability to "time-stamp" documents, it would be a great place for a publicly-available depository to which cable operators could easily check against for elections.

¹ *Electronic Delivery of MVPD Communications, Modernization of Media Regulation Initiative*, Notice of Proposed Rulemaking, MB Docket Nos. 17-317, 17-105, FCC 17-168 (*rel.* Dec. 14, 2017) (Notice).

In conclusion, Meredith supports defaulting to retransmission consent and utilizing the FCC.gov public inspection file as an election notice mechanism.

Very truly yours,



Joshua N. Pila